

**UNITED STATES DISTRICT COURT
CRIMINAL MOTION MINUTES**

Date: 6/13/2019
Time: 10:03 – 11:48

Judge: Anthony J. Trenga
Reporter: Rhonda Montgomery
Deputy Clerk: Dani Zirk

Case Number: 1:18-CR-457

UNITED STATES OF AMERICA

vs.

BIJAN RAFIEKIAN
KAMIL ALPTEKIN

<u> </u>	Present	<u> X </u>	Not Present
<u> </u>	Present	<u> X </u>	Not Present

<u>Counsel for Defendant Rafiekian</u> Robert Trout Stacey Mitchell Mark MacDougall Adam Bereston John Murphy Samantha Block	<u>Counsel for Government</u> Evan Turgeon James Gillis
<u>Counsel for Defendant Alptekin</u> Rodney Page Jennifer Kies Mammen	

PROCEEDINGS:

Motion to/for:

Motion for Additional Peremptory Challenges [150] by deft.

Motion for A Jury Questionnaire [152] by deft.

Motion in Limine to Exclude Out-Of-Court Statements by Co-Conspirators [154] by deft.

Motion for In Camera Inspection of Attorney-Client Communications [157] by deft.

Motion to Suppress Privileged Information [163] by deft.

Motion in Limine to Preclude The Government From Arguing That Turkey Funded FIG's Work for Inovo [165] by deft.

Motion in Limine to Establish Crime-Fraud Exception [173] by govt.

Motion to Establish Crime-Fraud Exception re Arent Fox LLP [182] by deft.

Motion for Special Appearance to Oppose Government's Motion to Establish Crime-Fraud Exception [188] by deft. - GRANTED

Motion to Dismiss the Indictment [190] by deft.

The Court requests a complete briefing on the Motion to Dismiss the Indictment [190] – opposition by the Government is to be filed by June 20th with a reply to be filed by the Defendant on June 25th and argument to take place on June 28, 2019 at 9:00 a.m.

The Government is given leave to file a motion with respect to attorney work product.